

## **Bibby Line Group – Modern Slavery Statement**

**Approved by the Board 28 May 2019**

### **Opening Statement from Bibby Line Group**

Bibby Line Group is a family owned global business that is committed to acting responsibly.

We are committed to our corporate values and policies, which promote ethical business practices. We have a zero tolerance of slavery, servitude and forced or compulsory labour and human trafficking. We also require the same high standards from our contractors, suppliers and other business partners. As a result, we go beyond the minimum legal requirements and all our subsidiaries now comply with the legislation, regardless of the £36m turnover qualification.

### **Structure of the organisation**

Bibby Line Group is a diverse and forward-looking family business delivering personal, responsive and flexible customer solutions for over 200 years.

Bibby Line Group is a £800 million revenue business, operating in 16 countries, employing over 4,000 people in industries including retail, financial services, distribution, marine and construction equipment hire.

Bibby Line Group operates with strong corporate values:

- Work together
- Be better
- Trust each other
- Be innovative
- Do the right thing

Bibby Line Group upholds high levels of corporate governance and corporate social responsibility.

We are committed to operating within the law, with ethical business practices, and being responsible to the communities in which we operate.

We strongly support the eradication of slavery, as well as the eradication of servitude, forced or compulsory labour and human trafficking.

### **Scope and Structure**

This statement covers Bibby Line Group Head Office (which includes Bibby Line Group Limited & Bibby Holdings Limited) and all our subsidiaries. We operate substantially autonomous operating subsidiaries each responsible for their own strategy, results and operations.

Each subsidiary is responsible for its own statement in relation to Modern Slavery – please review the individual statements.

- [Bibby Financial Services](#)
- [Costcutter Supermarkets Group](#)
- [Bibby Distribution](#)
- [Garic Ltd](#)
- [Bibby Marine Ltd](#)

## **Bibby Line Group Supply Chains**

Group head office (which includes Bibby Line Group Limited & Bibby Holdings Limited) employs less than 40 people and procures products and services including facilities management, maintenance and cleaning, office equipment and supplies, utilities, communications, recruitment, management consultancy, legal and audit services. Our subsidiaries procure a wide range of services and products to meet their business needs and these are listed within their individual statements.

## **Policies in relation to Slavery and Human Trafficking**

All our suppliers are expected to comply with all national and local, relevant law and regulations. Where we become aware of any organisation that has been or is found to be knowingly involved in modern slavery we will cease to trade with that organisation. Other relevant BLG policies and procedures:

- BLG Procurement Policy;
- Recruitment Right to Work Checks;
- Bullying & Harassment policy;
- Whistleblowing Policy;
- Anti-Bribery & Corruption policy.

In addition, our subsidiaries each have their own policies and procedures in relation to Modern Slavery – please review the individual statements.

## **Due Diligence**

The potential risks of an inadvertent breach of the principles espoused in this statement are managed through our corporate risk framework, based on the “3 levels of defence” approach.

Bibby Line Group requires all its subsidiaries to comply with the Modern Slavery Act, and therefore subsidiary statements are reviewed by their relevant subsidiary Board and signed off by a director. The level and extent of due diligence carried out is as appropriate to the subsidiaries, and is detailed in their individual statements

Any incidents or breaches of the Act would be notified to the respective Boards through the risk management process. We have no recorded incidents of our own, or suppliers’, breaching of the Act.

As part of our commitment to monitor and reduce the risk of slavery and human trafficking from within our organisation and from those businesses with which we interact we have adopted the following due diligence procedures:

- We work closely with our supply chains to ensure compliance with legislative obligations and we expect those organisations to have suitable anti-slavery and human trafficking policies and processes.
- We seek to build long standing relationships with suppliers and to make clear our expectations of ethical business behaviour from them.
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.
- We maintain and monitor an anti-bribery and corruption register from quarterly employee data. This is approved by the Board on an annual basis.
- We expect a level of due diligence carried out across the subsidiaries, and require them to detail it in their individual statements.

**Next Steps**

Bibby Line Group will continue to monitor best practice in this area as it develops and seeks to implement any necessary changes. We will continue to invest and implement relevant training, processes and procedures where appropriate and will also continue to ensure appropriate levels of risk awareness in respect of modern slavery and human trafficking is communicated to all our colleagues.

**Validation**

This statement is made in relation to the UK Modern Slavery Act 2015, Section 54 and constitutes Bibby Line Group Limited and its subsidiaries' slavery and human trafficking transparency statement for the financial year ending 31st December 2018.



**John Cresswell**  
**Chief Executive Officer**

**13 June 2019**